

EXHIBIT A

Transcript of the Testimony of **Daniella Esther Rodriguez**

June 5, 2025

Akari Johnson, ET AL. v. MMI 82, LLC, ET. AL.,



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1 MR. NARULA: Objection, speculation.

2 A I don't believe so. I mean, it was all in
3 plain sight, what we were throwing, he was standing
4 there, but I did it verbally, or nobody verbally said,
5 look, these are timecards. It was just out in the open
6 and just put in the box.

7 Q (BY Mr. Barroukh) And is every statement made
8 in this declaration truthful?

9 A Yes.

10 Q Now Ms. Frapp at her deposition testified
11 that she found documents in a certain file cabinet
12 destroyed as if a storm had done. Do you understand?

13 A Um-hum.

14 Q Do you know, or do you have any reason to
15 believe that why those documents were destroyed, or do
16 you have knowledge as to why those documents were
17 destroyed?

18 MR. NARULA: Objection, speculation.

19 A I am not sure why they would have been
20 destroyed.

21 Q (BY Mr. Barroukh) Do you know how those
22 documents came to become damaged by water?

23 MR. NARULA: Objection, asked and answered.

24 A I'm not sure because we haven't had any
25 hurricanes in the Keys in a while.

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2 CERTIFICATE OF REPORTER

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7 I, JANSEN VIANA, Court Reporter, certify that I was
8 authorized to and did report the Deposition of DANIELLA
9 ESTHER RODRIGUEZ; that a review of the transcript was
10 requested; and that the transcript is a true and correct
11 record of my notes.

12 I further certify that I am not a relative, employee,
13 attorney, or counsel of any of the parties, nor am I a
14 relative or employee of any of the parties, attorneys or
15 counsel connected with the action, nor am I financially
16 interested in the action.

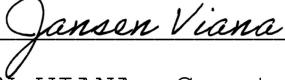
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Dated this 20th day of June 2025.

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21 JANSEN VIANA, Court Reporter

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